

EXHIBIT F

Justina K. Sessions

From: Justina K. Sessions
Sent: Tuesday, August 30, 2016 8:07 AM
To: 'Ronnie Spiegel'; Jeniphr Breckenridge (Jeniphr@hbsslaw.com)
Subject: Auto Parts - Subpoena to Honda

Ronnie and Jeniphr,
Please forward this as appropriate.

Counsel,

Further to our discussions regarding the Serving Parties' motion to compel and Honda's offer of a compromise regarding document and data production, I have additional information in response to your questions.

Parts purchasing information

As you will recall, Honda offered to produce the "cost by ship" data that purchasing provides to accounting and manufacturing prior to mass production. This data includes the total anticipated outsource cost for a new vehicle/major model change. Manufacturing and accounting do not receive a more-detailed breakdown of parts costs as part of the price-setting process. Nonetheless, you asked for the "backup" to this cost by ship, which would include the prior-to-mass-production price of all individual parts. As a compromise, Honda is willing to produce this backup data for every major model change for North American-manufactured vehicles for the past 10 years (and farther back if that information is readily accessible). As this part-by-part cost data includes supplier information, it will obviate the need for any separate document or data production regarding (i) a list of Honda's suppliers; and (ii) information about which suppliers were awarded the business for particular models. We propose limiting our production to major model changes because Honda very rarely changes suppliers between major model changes. This information coupled with the substantial productions from Honda's suppliers should enable you to determine whether there are any "holes" in the bid and purchase data that you already have. As I have previously told you, Honda is willing to work with the serving parties regarding additional RFQ and bid data, but a blanket request for all RFQs and bids for all parts is extremely burdensome, duplicative, and unnecessary – especially in light of Honda's already-substantial production of MLEF information (see below).

You also asked whether Honda has contracts with its parts suppliers. Honda has a standard contract that it uses with its suppliers. The contract is not specific to parts or models, but is a master agreement covering all parts. I assume that these contracts were requested as part of document requests to Honda's suppliers.

You asked about maker layout evaluation forms (MLEFs). As you will see from reviewing Honda's document production to date, you already have a substantial production of MLEFs relating to: wire harnesses, electronic control units, heater control panels, instrument panel clusters, fuse boxes, relay boxes, junction blocks, power distributors, wiring connectors and terminals, lead wire assemblies, cable bond, anti-lock brake skid sensors and wires, switches, occupant detection sensors, cable reels, oil pressure switches and sensors, fuel senders and gauges, switches, steering angle sensors, seat belts, spark plugs, radiators, AVR parts, windshield wipers/washers, and bearings. We believe this substantial production is more than sufficient. As a further offer of compromise, however, Honda is willing to produce the operations and procedure documents governing Honda's use of MLEFs. These documents provide an explanation of (i) when MLEFs are used; (ii) how they are completed; and (iii) how MLEF scores are computed and used.

Finally, you asked about something called a "lined business framework." Honda does not use any tool or software by this name.

Manufacturing/cost-setting information

As you recall, Honda offered to produce the quarterly quotations that Honda manufacturing provides to American Honda Motor Co., Inc. Honda remains willing to produce the quarterly quotation amounts for US-manufactured models back to 1998, which is the earliest date that we have data in the current database.

You also asked whether Honda would be willing to produce copies of every single pricing announcement and/or dealer announcement regarding changes to holdback, etc. Honda believes this request is unreasonably burdensome given that Honda has already produced complete data regarding MSRP, dealer invoice price, fuel allowance, and holdback from 2000 to the present. We also inquired with Honda regarding the time it would take to locate every single dealer communication as you request. Honda employees estimate that this would take at least one week of uninterrupted work, as the letters you request are not kept in any single central location.

Deposition dates and locations

You asked about September 28-29. Honda's inside and outside counsel have vacations scheduled for that time, so it will not work. We can look into dates in October. Also, depositions regarding price-setting, manufacturing data, and any "downstream" data will take place in Torrance, CA. Depending on the timing, a deposition regarding purchasing will take place in Ohio or Torrance.

Regards,
Justina

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